

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION**

MANDY TAYLOR

PLAINTIFF

vs.

CAUSE NO. 3:15-CV-187-MPM-SAA

**DESOTO COUNTY, MISSISSIPPI;
DEPUTY CHARLES BRYAN ANDREWS,
in his individual capacity; JOHN DOES 1 through 3
in their individual capacities, all of which whose
names are presently unknown but will be substituted
by amendment when ascertained**

DEFENDANTS

**30(b)(6) and 30(b)(5) NOTICE OF VIDEO DEPOSITION
OF DESOTO COUNTY, MISSISSIPPI**

TO: Defendant DeSoto County, Mississippi
c/o **Danny Griffith, Esq.**
Griffith & Carr
123 South Court Street
P. O. Drawer 1680
Cleveland, MS 38732
danny@griffithcarr.com

Please take notice that at the time, place and date indicated below, Plaintiff will take the testimony by deposition upon oral examination of the party named below, pursuant to the *Federal Rule of Civil Procedure* 30(b)(6), before a Notary Public or other officer authorized by law to administer oaths, by audiovisual and stenographic means. Such deposition shall be taken for the purpose of discovery or for use as evidence in their action, or for both purposes, and will continue from time to time until completed, at which time and place you are notified to appear and take such part in the examination as shall be fit and proper.

DEPONENT: **30(b)(6) representative of DeSoto County, Mississippi**
DATE & TIME: April 12, 2016 at 1:30 p.m.
LOCATION: Stroud Law Firm, P.C.
5779 Getwell Road, Building C-1
Southaven, MS 38632

- A. Pursuant to Federal Rule of Civil Procedure 30(b)(6), Defendant DeSoto County, Mississippi is directed to designate a person or persons to testify on its behalf in the following matters:
1. The background facts, cause of injury, names and contact information of all individuals, jail officials/officers who were involved in or in any way with the incident or connected with any investigation of the incident causing injury to detainee, Mandy Taylor on August 29, 2015 in the DeSoto County Jail.
 2. To-scale layout of jail, including locations of video cameras and video monitors and areas of surveillance of each.
 3. Policies, S.O. P.'s and procedures relating to placement of video monitors inside the jail, inside each holding cell, observation by monitoring personnel, personnel assigned to monitor during period of Mandy Taylor's custody, existence and preservation of video data (storage locations, length of retention, custodian(s)).
 4. Policies, S.O.P.'s, procedures, training for staff, specifically relating to Defendant Charles Bryan Andrews, and any violations and discipline for violation of policies for Charles Bryan Andrews within five (5) years prior to August 29, 2015.
 5. Internal investigation of the injury to Mandy Taylor while in the custody of the Desoto County jail, including the nature, scope, documentation, identify of participants, roles of each participant, post-incident interviews and statements, discipline procedures and chain of command for disciplinary decision making, and discipline imposed, if any.
 6. All jail and departmental records related to arrest, booking, custody, care and release of Mandy Taylor, including, but not limited to routine jail records, statements by Mandy Taylor, recordings of Mandy Taylor, conduct of Mandy Taylor, reports and authors of reports regarding Mandy Taylor and/or the incident at issue, medical records of Mandy Taylor, personal property inventory, etc.
 7. All matters relating to the handling of detainee Mandy Taylor, beginning at time of her booking and going forward.

- B. Pursuant to Rule 30(b)(5) of the Federal Rules of Civil Procedure, Defendant DeSoto County is also directed to produce at the deposition copies of documents or electronic data responsive to any of the areas of discussion mentioned in Topic Nos. 1-7 above.

Respectfully submitted this 17th day of March, 2016.

/s/Philip A. Stroud

Philip A. Stroud (Ms. Bar No. 99401)

THE STROUD LAW FIRM, P.C.

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I certify that on the 17th day of March, 2016, I electronically filed the foregoing document with the Clerk of the Court using the ECF system, which sent electronic notification of this filing to the following attorneys for Defendant:

Daniel J. Griffith

Griffith & Carr

123 South Court Street

P. O. Drawer 1680

Cleveland, MS 38732

danny@griffithcarr.com

Counsel for Defendants

I also certify that on the same date I served the foregoing document via First Class, U. S. Mail, on the following non-ECF participants: None.

/s/Philip A. Stroud

Philip A. Stroud